



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF RESPONSE AND RESTORATION
ASSESSMENT AND RESTORATION DIVISION
BUILDING 4
7600 Sand Point Way NE
Seattle, WA 98115

September 11, 2006

Mr. Chip Humprey & Mr. Eric Blischke
Superfund Division, Remedial Project Managers
U. S. Environmental Protection Agency
Sixth Avenue
Seattle, WA 75202-2733

Dear Sirs:

The natural resource Trustees for the Portland Harbor NPL Site have reviewed the Portland Harbor RI/FS Field Sampling Plan: Round 3 Sampling for Lamprey (*Lampetra* sp.) Ammocoete Tissue August 24, 2006 - Prepared for the Lower Willamette Group by Windward Environmental LLC.

I have compiled Trustee comments and present them here for your use. We have tried to concentrate on the most important issues considering .

During our coordination call, the Trustees discussed the need to make the FSP cover the present, amended ISA, i.e., that additional upstream sample locations be appended to the FSP. The addendum received today may address this DQO.

The Trustees also recommend that a field reconnaissance 'shake down' coordination event be scheduled as soon as is practicable. Glitches revealed may reduce the need to make last minute changes in the field effort.

General Comments

The Trustees have several general coordination recommendations:

- That a schedule of effort be established & changes be well coordinated with the Trustees to facilitate Trustee participation during the field efforts.
- Trustee hands can be included to assist Windward &/or their contractor in the field effort. The Trustees intend to coordinate boat availability among our selves, but would appreciate at least one observer slot be available, as appropriate, during the effort.



- That a rapid critical decision consultation mechanism (cell phone tree?) be established as a contingency if major consultation might be required – e.g., termination of effort or major sampling re-design based on field conditions

Specific Comments

- Could there be more than one of 20 sites with replicate samples (i.e., further (3?) replicates where many or large ammocoetes are taken).
- Page 2, Section 2.0: One of our overall objectives is to definitively determine if ammocoetes are residing within the ISA, our pre-conceived sampling areas may not be correct. The shocker/sucker technology should be employed to some degree to resolve this question.
- There should be enough flexibility to move on to a new / neighboring station if lamprey are not found. However, there should be an appropriate level of effort such that the area was appropriately characterized. This should be decided prior to sampling, although it can be modified as we learn.
- If ammocoetes are encountered, sampling should continue in that area until tissue mass requirements are met.
- Coordinates of each 'productive' sample cast should be recorded. If the sampler is used in 'transect' fashion, starting & ending positions of productive transects should be recorded. Catch per effort should be recorded.

Summary

We appreciate the continuing cooperative relationship between the Trustees, NOAA and the EPA toward our mutual goal of protecting and restoring our Nations' natural resources. A conference call this week among the partners may be needed to sort out the final design issues. NOAA will be glad to provide a conference call dial in number. Please feel free to contact me at (206) 526-6938 if you would like to discuss any of these issues.

On Behalf of the Trustees,

Ron Gouguet
NOAA Coastal Resource Coordinator